

DECLARATION OF AMADA MAN

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1. My name is Amada Man and my date of birth is February 2, 2002. Although the State of Texas now considers me too young to decide whether I can work as an exotic dancer, I am competent to give testimony in this matter and I have personal knowledge of the facts set forth below.

2. I am a resident of Dallas, Texas, and I am a nineteen-year-old woman. I've been on my own and I've had to take care of myself since I turned 18. I don't come from a rich or well-off family. Like most other adults, I'm responsible for paying for all of my own necessities and meeting various financial obligations. Since about August 2020, I've chosen to make my living as a dancer who performs at exotic dance clubs in the Dallas area.

3. Different women have different reasons for becoming a dancer. In my case, I chose to become a dancer because it offers the highest income available to me. I would estimate that on average, I've made about \$60 an hour dancing. This work has given me the ability to fully support myself, easily meet all of my financial obligations, and freed me from having to depend on anyone else to get by. I can't say that any of that would be true if I worked other kinds of jobs out there that pay minimum wage or maybe \$12-15 an hour, if you're lucky.

4. I enjoy the work for other reasons too. I'm basically my own boss and I decide where, when, and how much I work. I also enjoy the fact that I can use my appearance and ability to dance as a way to make a good living and live in a decent apartment. This work may not be for everyone, but for me, dancing for an audience or a customer gives me the kind of power and control that I wouldn't have if I worked at a fast-food restaurant.

5. No one forced me into this line of work. No one has ever victimized me because I work as a dancer. I've never felt that my job as a dancer has made me any more vulnerable to

becoming someone else's victim, endangered my body, or exposed me to illegal things. In my life, I have been exposed to those kinds of dangers—not at the clubs where I've danced—but at the low-paying, everyday kinds of jobs that I've had in the past.

6. If anything, I've actually felt safe working at the clubs where I chose to perform. They have strictly enforced rules that ban anyone from doing things like engaging in violence, prostitution, doing drugs, or underage drinking. They have security cameras everywhere monitoring what everyone's doing. The managers are always patrolling to make sure that nothing illegal is going on. They've told me and other dancers to tell them if any customers give us a hard time or become threatening.

7. Although I haven't run into a situation where I've felt unsafe at the clubs where I performed, I knew that if I ever did need help, I had people nearby who would take me seriously and step-in. I can't say that about other situations that I've been in, or at other 'regular' jobs I've worked, where no one listened to my voice.

8. A couple of weeks ago, I started to see people on the internet talking about how it had become illegal for people under the age of 21 to work as strippers in Texas. I thought they were just making stuff up. But then I found out from another dancer who I know that the club where we were performing wouldn't allow any dancers under 21 to continue performing there.

9. This news devastated me. I immediately started thinking about how I was going to pay my rent and other bills. I've made a point of being responsible with the money that I've earned as a dancer, so I do have some savings. I planned to use that money to get an education or learn a trade. In particular, I want to go to beauty school. I don't plan on being a dancer forever.

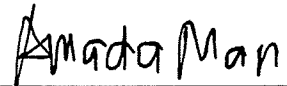
10. Now I find myself having to use up my savings to pay rent and other bills until I figure out what to do. What I do know is that I would immediately return to performing as an exotic dancer where I live in Texas if I could.

11. I would say to anyone who thinks that I shouldn't return to working as a dancer until I turn 21 in 2023 that, unless they're willing to pay for all of my bills or pay for me to go to school, they don't have the right to tell me that how I've decided to make a living is wrong, illegal, or not in my best interest. I don't know how anyone could think that taking away my source of income without any warning, or that making me face homelessness, is somehow in my best interest.

12. I've chosen to become a plaintiff in this case because I think it's important to stand up for myself and because I know that there are lots of other women out there just like me who have also been put out of work. If I'm old enough to be evicted or sued for failing to pay my rent, and old enough to pursue my own lawsuit in a federal court without having to get a parent's consent, I should have the right and freedom to continue earning my living as a dancer.

Pursuant to 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, Texas on this 7th day of June, 2021.



Amada E. Man